

# **EXHIBIT I**

Videotaped Deposition of  
**Stacy Abrams**  
March 03, 2023

Freeman

vs.

Deeks

**Confidential**



Confidential

Freeman vs.  
Deebs

Stacy Abrams

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3  
4 LYNNE FREEMAN, an  
5 individual,  
6 Plaintiff,  
7 vs. No. 1:22-cv-02435-LLS  
8 TRACY DEEBS-ELKENANEY P/K/A  
9 TRACY WOLFF, an individual;  
10 et al.,  
11 Defendants.

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12  
13  
14 CONFIDENTIAL  
15 VIDEO DEPOSITION OF STACY ABRAMS  
16 Reported Remotely through Videoconference  
17 March 3, 2023  
18  
19  
20  
21  
22

23 Reported by:  
24 Margaret A. Smith  
25 RPR, CRR, CSR No. 9733  
Job No.: 10115785

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Freeman vs.  
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21 Deposition of STACY ABRAMS taken on behalf of  
22 Plaintiff, reported remotely through videoconference,  
23 beginning at 6:57 a.m. PST, and ending at 1:05 p.m. PST,  
24 on Friday, March 3, 2023, before Margaret A. Smith, RPR,  
25 CRR, Certified Shorthand Reporter No. 9733.

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Deebs

Stacy Abrams

1 APPEARANCES (via videoconference):

2

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12 ENTANGLED PUBLISHING, LLC; HOLTZBRINCK PUBLISHER, LLC,

13 D/B/A MACMILLAN; UNIVERSAL CITY STUDIOS, LLC:

14 COWAN, DEBAETS, ABRAHAMS & SHEPPARD LLP

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Deebs

Stacy Abrams

1 APPEARANCES (via videoconference):  
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12 Also present:  
13 Kevin Gonzalez, Aptus videographer  
14 Trent Baer  
15 Lynne Freeman  
16 Tracy Deebs  
17  
18  
19  
20  
21  
22  
23  
24  
25

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Stacy Abrams

1 someone in New York book publishing.

2 Q And what is your relationship between Walker  
3 and Bloomsbury.

4 A So Walker is considered an imprint. They were  
5 an independent publisher for many years. And then they  
6 were purchased by Bloomsbury before I started there.  
7 And so they became almost a subsidiary. I don't know if  
8 that's the correct legal term. But in book publishing,  
9 they're called an imprint.

10 Q So you were the editor -- at Bloomsbury -- I'm  
11 sorry.

12 At Entangled, you were the editorial director  
13 of publishing?

14 A Yes.

15 Q Was that your sole title the whole time you  
16 were there?

17 A For many years. I have now moved into V.P. of  
18 operations as well.

19 Q And what were your job duties as the editorial  
20 director?

21 A At Entangled?

22 Q Excuse me?

23 A At Entangled?

24 Q At Entangled.

25 A Consider books for acquisition, sit on the

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Stacy Abrams

1 recall right now.

2 Q And what about books you edited, would it be  
3 the same list --

4 A Yes.

5 Q -- or would it be additional books?

6 A Yes.

7 Q Same list?

8 All right. Was Tempest series the only YA  
9 book?

10 A No. Many of the books that I worked on were  
11 YA, including the titles I just listed by Jessica  
12 Warman.

13 MR. HALPERIN: Just for the record, can we just  
14 say what YA stands for. I don't believe that's been  
15 said yet.

16 THE WITNESS: Yes. Young adult. Essentially  
17 books for ages 12 to 18.

18 BY MR. PASSIN:

19 Q Were any of the books you mentioned young adult  
20 paranormal books?

21 A Between by Jessica Warman, and the Tempest  
22 series by Tracy Deebs.

23 Q Who is Emily Kim?

24 A She is a literary agent.

25 Q And when did you first meet Ms. Kim?



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1           A       It was a Tempest book.

2           Q       All right. And then what about at Entangled?

3           A       At Entangled, we did a series together for the  
4 Brazen line. It was called the Shaken Dirty series.  
5 And I do not recall each individual title.

6           Q       How many titles were there?

7           A       Four.

8           Q       And what other books were published by  
9 Entangled of Tracy Wolff's?

10          A       The Crave series.

11          Q       And how many books have currently been  
12 published?

13          A       Seven. Oh, I'm sorry. Six.

14          Q       Six. So you've actually published closer to 13  
15 books of Tracy Wolff's. Is that correct?

16          A       This is why I'm asking published, because I am  
17 an employee of Entangled. But, as I've said, I'm very  
18 peripherally involved in the creative series. I did not  
19 count it in my numbers.

20          Q       Why do you say you're very peripherally  
21 involved in the Crave series?

22          A       Because I was the copy editor, not the content  
23 editor.

24          Q       So does that mean that you were not involved at  
25 all in creating the story voice -- the story or voice of

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1 the Crave book series?

2 A Can you clarify what you mean by "involved."

3 Q Well, what involvement did you have in creating  
4 the -- the story and line voice -- story and voice of  
5 the Crave series?

6 MR. HALPERIN: Object to form.

7 THE WITNESS: So Tracy was my author. I  
8 introduced her to Liz. From my time at Bloomsbury. I  
9 suggested that she would be a great person to write this  
10 series. And so I was peripherally involved in some of  
11 the early discussions between Tracy and Liz, coming up  
12 with ideas.

13 That was where my involvement ended until I was  
14 helping with the copy edits.

15 BY MR. PASSIN:

16 Q And when did you introduce her to Liz?

17 A I do not know an exact date.

18 Q Well, was it when you were working at  
19 Bloomsbury, or Entangled?

20 A When I was working at Entangled.

21 MR. HALPERIN: Just give me a moment to object,  
22 please, Ms. Abrams.

23 THE REPORTER: And Counsel, if there was an  
24 objection, the reporter would need to hear again,  
25 please.

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1 Wolff a lot?

2 MR. HALPERIN: Object to the form.

3 THE WITNESS: Can you define "a lot."

4 BY MR. PASSIN:

5 Q Over the years, how often have you worked with  
6 Tracy Wolff?

7 A Fairly frequently. I think we've already  
8 covered I've done a lot of books with her.

9 Q Would you characterize Tracy Wolff as a friend?

10 MR. HALPERIN: Object to the form.

11 THE WITNESS: A friend and a colleague.

12 BY MR. PASSIN:

13 Q Would you characterize her as a good friend?

14 MR. HALPERIN: Object to the form.

15 THE WITNESS: No.

16 BY MR. PASSIN:

17 Q Do you socialize with her?

18 MR. HALPERIN: Object to the form.

19 THE WITNESS: Can you define "socialize."

20 BY MR. PASSIN:

21 Q I think you know what socialize means. Go out  
22 to dinner, go out to parties, nonwork events.

23 A No.

24 Q Do you go out to work dinners or work parties  
25 with her?

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1 THE WITNESS: As you can see, nothing. She  
2 just forwarded.

3 BY MR. PASSIN:

4 Q Well, it says in the email Liz asked me to  
5 respond to you. So she -- I'm assuming she said  
6 something.

7 A No. This is how she works.

8 Q Okay. What did you mean when you said Liz is  
9 currently closed to acquisitions?

10 A It's fairly standard in the publishing industry  
11 to close to submissions periodically when your workload  
12 is just too high.

13 Q Meaning, you're not accepting any new  
14 submissions?

15 A Yes.

16 Q What did you mean when you said "It definitely  
17 sounds like it could be up my alley"?

18 A It was a young adult novel, and I was currently  
19 acquiring young adult novels.

20 Q Well, if Liz was closed to acquisitions, why  
21 did you ask Ms. Kim to send you the manuscript?

22 A Because I was not --

23 MR. HALPERIN: Objection. Asked and answered.

24 THE WITNESS: -- closed. Sorry.

25

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1           A       I believe so, yes.

2           Q       And when you say "you're done with them,"  
3 meaning you reject them?

4           A       Yes.

5           Q       So do you have any idea what happened to the  
6 copy of Masqued that Emily Sylvan Kim sent you?

7                   MR. HALPERIN: Object to form.

8                   THE WITNESS: I don't know.

9 BY MR. PASSIN:

10          Q       All right. When she sent it to you, did you  
11 read it?

12          A       No, I don't believe so.

13          Q       Why would you not read it?

14          A       I have a long list of submissions. And so I do  
15 not read them right away.

16          Q       But don't you read them eventually? You told  
17 me you were interested in the book, please send it to  
18 me. And then you wouldn't have the courtesy of reading  
19 it?

20                   MR. HALPERIN: Object to the form. That's very  
21 argumentative. And she already said she didn't read it.

22                   MR. PASSIN: And don't coach the witness. If  
23 you do that one more time, I'm getting the judge on the  
24 phone.

25                   THE WITNESS: Can you repeat the question.

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1 MR. PASSIN: Read the question back, please.

2 (The following was read by the reporter:

3 Q. But don't you read them eventually? You  
4 told me you were interested in the book, please  
5 send it to me. And then you wouldn't have the  
6 courtesy of reading it?)

7 THE WITNESS: As you said, not right away.

8 BY MR. PASSIN:

9 Q But you did eventually read it?

10 A Not that I recall.

11 Q Why wouldn't you read it? That's your job.

12 MR. HALPERIN: Object to form for the same  
13 reasons stated.

14 BY MR. PASSIN:

15 Q So you're telling me you didn't do your job?

16 MR. HALPERIN: Object to form. You're arguing  
17 with her.

18 MR. PASSIN: I'm arguing with her because I  
19 don't find her story believable.

20 THE WITNESS: I receive anywhere from five to  
21 20 manuscripts a day. There are definitely not enough  
22 hours in the day to read every manuscript. I would  
23 estimate that from the time I receive a submission, it  
24 takes about three to four months before I actually read  
25 it.

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Stacy Abrams

1 BY MR. PASSIN:

2 Q All right. And what I'm asking you, did you  
3 eventually read this manuscript?

4 MR. HALPERIN: Objection. Asked and answered.  
5 No.

6 BY MR. PASSIN:

7 Q Why didn't you read it?

8 MR. HALPERIN: Objection. Asked and answered.

9 THE WITNESS: I don't recall.

10 BY MR. PASSIN:

11 Q Is it your normal practice to tell an agent  
12 that you work with all the time that I'm interested in  
13 the manuscript, send it to me, and then not read it?

14 MR. HALPERIN: Object to the form.

15 THE WITNESS: It is my normal practice to say  
16 I'm interested and read it as soon as my time allows.

17 BY MR. PASSIN:

18 Q So are you saying to me you never read it  
19 because your time didn't allow?

20 MR. HALPERIN: Objection. Asked and answered.

21 BY MR. PASSIN:

22 Q And I'll remind you you're testifying under  
23 penalty of perjury.

24 MR. HALPERIN: Objection. You're threatening  
25 the witness. And you've asked this question, like, five

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1 in your life have you read all or any portion of  
2 Masqued?

3 MR. HALPERIN: Objection to form.

4 THE WITNESS: I do not know.

5 BY MR. PASSIN:

6 Q But you may have read all or a portion of it.  
7 Correct?

8 A I believe I already stated I didn't know.

9 MR. HALPERIN: Objection. Asked and answered.

10 BY MR. PASSIN:

11 Q Please answer the question.

12 A I have already stated that I did not.

13 Q I thought you said you might have but that you  
14 just don't recall.

15 A I suppose. I just do not recall.

16 Q Was any of the material or ideas from Masqued  
17 used in any of the Crave books?

18 MR. HALPERIN: Objection to form.

19 THE WITNESS: No.

20 BY MR. PASSIN:

21 Q Was any of the material or ideas from Masqued  
22 used in any of the Tempest Rising books?

23 MR. HALPERIN: Objection to form.

24 THE WITNESS: No.

25



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1 THE WITNESS: I suppose it's possible.

2 BY MR. PASSIN:

3 Q Are you aware of whether or not Tracy Wolff  
4 ever read all or any part of Masqued?

5 MR. HALPERIN: Objection to form.

6 THE WITNESS: I do not know.

7 BY MR. PASSIN:

8 Q Was any of the material or ideas from Masqued  
9 that you are aware of ever used in any drafts of any of  
10 the Crave books?

11 MR. HALPERIN: Objection. Asked and answered.

12 THE WITNESS: No.

13 BY MR. PASSIN:

14 Q As far as you're aware?

15 MR. HALPERIN: Objection. Asked and answered.

16 BY MR. PASSIN:

17 Q Well, you're not the only one that contributed  
18 to the Crave books. Isn't that correct?

19 MR. HALPERIN: Objection. That assumes facts  
20 not in evidence and objection to form.

21 BY MR. PASSIN:

22 Q Answer the question, please.

23 A Can you repeat it.

24 MR. PASSIN: Can the reporter read the question  
25 back, please.

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1 (The following was read by the reporter:

2 Q. Well, you're not the only one that  
3 contributed to the Crave books. Isn't that  
4 correct?)

5 THE WITNESS: That I am aware of? No.

6 BY MR. PASSIN:

7 Q Did you -- did you or Tracy Wolff ever discuss  
8 Masqued -- Masqued?

9 A Absolutely not.

10 Q Did you or Tracy Wolff ever discuss Lynne  
11 Freeman?

12 A No.

13 Q Did you or Liz Pelletier ever discuss Masqued?

14 A No.

15 Q Why did you hesitate?

16 A I suppose you might need to clarify time frame.

17 Q Did you -- prior to my sending a demand letter  
18 to Tracy Wolff's counsel, did you and Liz Pelletier ever  
19 discuss Masqued?

20 A No.

21 Q Did you ever discuss Masqued with Liz Pelletier  
22 subsequent to that?

23 A Yes.

24 Q What did you discuss?

25 MR. HALPERIN: And I would just caution the

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1 Please repeat.

2 (The following was read by the reporter:

3 Q. All right. Did she tell you to tell -- to  
4 testify that you never read the book Masqued?)

5 THE WITNESS: No.

6 BY MR. PASSIN:

7 Q Was Tempest Rising the first young adult book  
8 written by Tracy Wolff?

9 A It was the first one published. I have no idea  
10 what else she wrote before that.

11 Q Who published Tempest Rising?

12 A The Walker imprint of Bloomsbury children's  
13 books.

14 Q Was it published while you were at Bloomsbury?

15 A Yes.

16 Q And what was your involvement?

17 MR. HALPERIN: Objection to form.

18 THE WITNESS: I was the acquiring editor.

19 BY MR. PASSIN:

20 Q And was it a series of books?

21 A Yes.

22 Q And how many books were in the series?

23 A Three.

24 Q And what were the names of the books?

25 A The first one was Tempest Rising. I should

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1 THE WITNESS: In part, yes.

2 BY MR. PASSIN:

3 Q What do you mean "in part"?

4 A I was the first one who suggested her to Liz.

5 Q And why did you suggest her?

6 A We worked very well together. She has a great  
7 voice. She's very commercial. And I thought she would  
8 understand what we hoped to do with this series.

9 Q With the series.

10 But the series didn't exist yet. Correct?

11 A Correct.

12 Q Is it accurate to say that Tempest Rising's  
13 books set the stage for the Crave series?

14 MR. HALPERIN: Objection to form.

15 THE WITNESS: I wouldn't actually say that was  
16 accurate. The books were quite old back list at that  
17 time. The only connection I would give is -- is me. It  
18 established our relationship.

19 BY MR. PASSIN:

20 Q When did Tracy Wolff write the first draft of  
21 Tempest Rising?

22 A I have no way of knowing that.

23 Q When did Tracy Wolff complete the last draft of  
24 Tempest Rising?

25 A Well, it was published in 2011. So going off

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Stacy Abrams

1 of standard publishing time, it was probably completed  
2 in late 2009 or early 2010.

3 Q Do you have in your possession any drafts of  
4 **Tempest Rising**?

5 A No.

6 MR. PASSIN: You know, we're getting into a  
7 whole new topic now. Do you want to take a break now  
8 for lunch?

9 THE WITNESS: Sure.

10 MR. PASSIN: Ben?

11 MR. HALPERIN: I'm good with whatever the  
12 witness would like.

13 MR. PASSIN: All right. So what do you want to  
14 say? A half hour?

15 MR. HALPERIN: Would you like longer than that?

16 THE WITNESS: What is standard?

17 VIDEOGRAPHER: Would you like to have this  
18 conversation off the record, Counsel?

19 MR. PASSIN: Yeah.

20 MR. HALPERIN: Yes, please. Let's go off the  
21 record.

22 VIDEOGRAPHER: Going off the record, the time  
23 is 9:40 a.m.

24 (Lunch recess from 9:40 a.m. to 10:32 a.m.)

25 VIDEOGRAPHER: The time is 10:32 a.m. We are

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1       them up separately. Yes. Let's do that.

2               VIDEOGRAPHER: And are they both Exhibit 7, or  
3       is one Exhibit 7 and the other Exhibit 8?

4               MR. PASSIN: You know, I was going to make them  
5       one exhibit. Let's do them 7 and 1eighth. That's a good  
6       idea. Can you put them both up at the same time or not?  
7       Let's do them one at a time. Let's do 7.

8               VIDEOGRAPHER: I can put them both at the same  
9       time if you'd like.

10              MR. PASSIN: Okay.

11                       (Exhibit 7 was marked for identification.)

12                       (Exhibit 8 was marked for identification.)

13       BY MR. PASSIN:

14              Q       Stacy, let me know when you're able to download  
15       them.

16              A       I've got it. I just might need a minute to  
17       read it.

18              Q       Okay.

19              A       Okay.

20              Q       Okay. So the Exhibit 7 is an email from Tracy  
21       Wolff. Tracy Deebs, who we decided I'll call Tracy  
22       Wolff, to you and Emily Kim, dated April 26th, 2019.  
23       And it says, "Hi, Stacy. I'm so excited that you  
24       thought of me for this. I've put together five basic  
25       ideas for you to look at. Everything is, of course,

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1 flexible when it comes to creatures, plot, et cetera.  
2 But I wanted to give you a rough idea of what I was  
3 thinking for each of them. I'm on my way to my cousin's  
4 wedding, but I'm happy to talk/answer emails later  
5 tonight or early tomorrow morning and would be happy to  
6 take another go at this if none of these ideas appeal.  
7 I have a few more, but I need to get on the road. LOL.

8 "Also, the fifth idea is contemporary, based on  
9 Meteor Garden/Boys over Flowers, the most successful  
10 Anime turned TV show for girls in Asia's history --  
11 Asia's history (and also HUGEY popular over here). I  
12 fleshed it out into a serial format but it can easily be  
13 combined into a four-book series, or one-book, even if  
14 it's something you might be interested in. But the  
15 dynamic is EXACTLY what Liz is looking for, ordinary  
16 girl into super rarefied world. Hence the huge  
17 worldwide response to it.

18 "Can't wait to hear what you think!"

19 Did you send -- excuse me.

20 Did you receive this email from Tracy Dibbs --  
21 Deeks on or about April 26th, 2019?

22 A It appears I did, yes.

23 Q You notice it says in the first paragraph that  
24 "I'm so excited that you thought of me for this." And  
25 in the penultimate paragraph, it says that "The dynamic

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1 is exactly what Liz is looking for, ordinary girl into  
2 super rarefied world."

3 Do you see?

4 A Yes.

5 Q Okay. Based on that, is it accurate to say  
6 that you communicated to Tracy Wolff prior to  
7 April 26th, 2019 that Entangled wanted to hire her to  
8 write a book about an ordinary girl in a super rarefied  
9 world?

10 MR. HALPERIN: Objection to form. And let me  
11 just clarify. You're asking only based on what is  
12 written to this email and not --

13 MR. PASSIN: You know, it's objection -- a  
14 speaking objection. If you have an objection, make it.  
15 I'm really close to calling the magistrate.

16 If you have an objection, make it.

17 MR. HALPERIN: I wasn't --

18 MR. PASSIN: Make your objection.

19 MR. HALPERIN: I'm making my objection.

20 MR. PASSIN: No.

21 MR. HALPERIN: You interrupted me.

22 MR. PASSIN: No.

23 MR. HALPERIN: And I just wanted to clarify.

24 MR. PASSIN: You're asking questions. Make an  
25 objection.



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1 MR. HALPERIN: I can't clarify a question? I'm  
2 sorry. I don't --

3 MR. PASSIN: No, you can't.

4 MR. HALPERIN: If you're asking based on this  
5 email or based on like, without her having --

6 MR. PASSIN: I asked a question. Would you  
7 read it back, please.

8 (The following was read by the reporter:

9 Q. Okay. Based on that, is it accurate to say  
10 that you communicated to Tracy Wolff prior to  
11 April 26th, 2019 that Entangled wanted to hire  
12 her to write a book about an ordinary girl in a  
13 super rarefied world?)

14 MR. HALPERIN: You can answer the question if  
15 you understand it.

16 THE WITNESS: Yes.

17 BY MR. PASSIN:

18 Q Okay. Was the communication oral, or written?

19 A Oral.

20 Q Was it face to face, or over the telephone?

21 A Telephone.

22 Q Was anyone else on the phone other than you and  
23 Tracy Wolff?

24 A No.

25 Q And when did that communication take place?

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1           A       I don't recall exactly. But, likely, a few  
2       days before Friday, April 26th of 2019.

3           Q       Did you approach Tracy Wolff, or did she  
4       approach you about working with Entangled?

5                   MR. HALPERIN: Objection to form.

6                   THE WITNESS: I approached her.

7       BY MR. PASSIN:

8           Q       What did Liz Wolff say in the conversation in  
9       response to your saying that Entangled wanted her to  
10      write a book about an ordinary girl in a super rarefied  
11      world?

12          A       She was excited to send me some ideas.

13          Q       Let's take a look at the attachment, Exhibit 8.

14          A       I have not downloaded it yet.

15          Q       You're pretty efficient at that, I must say.

16          A       I have a fast WiFi connection. It's up. But  
17      it's a handful of pages long. Do you need me to --

18          Q       I'll direct you. Do you want to read it -- I  
19      mean, I'm going to direct you to the one you need to  
20      read.

21          A       Okay.

22          Q       It's up to you.

23          A       No, go ahead.

24                   MR. HALPERIN: She's entitled to read it if she  
25      wants to read it.

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Freeman vs.  
Deebs

Stacy Abrams

1 statement.

2 A You want me to define what the meet cute is?

3 Q Yes.

4 A So this is essentially an industry term that  
5 means where the two romantic leads meet for the first  
6 time.

7 Q Okay. Then let's go back to Exhibit 9. You  
8 see at the bottom of the first page in the top of the  
9 second page, there are two comments that you claim were  
10 copied and pasted from Liz's notes.

11 Do you see that?

12 A Yes.

13 Q Okay. Were those two sections in the  
14 April 26th, 2019 email that you sent to Ms. Wolff, or  
15 were they added to the email after April 26th, 2019?

16 A They --

17 MR. HALPERIN: Objection to form.

18 THE WITNESS: They appear to be part of this  
19 email.

20 BY MR. PASSIN:

21 Q All right. But you don't know for a fact?

22 A I don't really understand the question.

23 Q You said it appears. But you don't know  
24 whether or not it was at the time or it was added later?

25 MR. HALPERIN: I'm sorry. Are you asking --

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Stacy Abrams

1 "Pattern the uncle after Snap (sic)"?

2 A Yes.

3 MR. HALPERIN: I believe it says Snape.

4 BY MR. PASSIN:

5 Q And who is Snap?

6 A That would be Snape. He is the bad guy in  
7 Harry Potter.

8 Q Oh, okay. All right.

9 A Played by Alan Rickman in the movies.

10 Q I guess it shows that I -- I don't know Harry  
11 Potter.

12 So let's look at the email at the top of the  
13 first page.

14 Do you see where Tracy Wolff suggests that the  
15 series of books be called oh, Gods and Monsters?

16 A I see all Of Gods and Monsters.

17 Q Yes, I'm sorry. Let me read it to you. It  
18 says "Absolutely!!! I will work on the most cute this  
19 weekend, and I will see what I can come up with on the  
20 notes. As for a title, I really want to stuck -- I  
21 really want to stuck" -- I guess it's supposed to be  
22 stick -- "with something around monster, that way if it  
23 becomes a series and she was her own powers, we can  
24 totally riff off that in the title. What do you think  
25 of Of Gods and monsters? Or Among Gods and Monsters?

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1 which is an email chain between Tracy Wolff and you,  
2 dated June 12th and 13, 2019.

3 Can you put that up, please.

4 (Exhibit 19 was marked for identification.)

5 THE WITNESS: Okay.

6 BY MR. PASSIN:

7 Q All right. So do -- by the way, let's go back  
8 to the -- no. Strike that. Okay.

9 With respect to Exhibit 19, did you exchange  
10 these emails on or about June 12th and June 13 with  
11 Tracy Wolff?

12 A Yes, it appears so.

13 Q Okay. Let's look at the bottom email. The  
14 bottom email says from you to Tracy, "Came across a few  
15 interesting articles on YA trends and wanted to share!"  
16 Then you have a link, it looks like, to two articles.

17 Do you remember those articles?

18 A No.

19 Q So you don't remember what they were about?

20 A I gather YA trends.

21 Q Okay. Then if you look at the next paragraph,  
22 there's a sentence at the end of the paragraph that  
23 says: Since Liz and I will be working on it together  
24 too, I want to make certain you're on her queue since I  
25 can -- since I (sic) can be so overloaded.

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1                   What does that mean, that you and Liz will be  
2                   working on it together too?

3                   MR. HALPERIN: And it says "since it can be so  
4                   overloaded," not since I can be so overloaded.

5                   MR. PASSIN: Okay. I copied it wrong. Thank  
6                   you.

7                   THE WITNESS: That is an important distinction,  
8                   because I meant Liz's queue can be so overloaded. She's  
9                   very busy. I'm not overloaded.

10                  Essentially, what I've already explained, which  
11                  is that Liz was going to be the content editor, and I  
12                  would be the copy editor at the end. We would be  
13                  working on it together, but she would be doing the  
14                  majority of the editing, which is why we needed to get  
15                  Tracy into her queue.

16                  BY MR. PASSIN:

17                  Q       Okay. And then explain to me what a content  
18                  editor does.

19                  A       A content editor works on story plotting,  
20                  pacing, characterization, a broad overview of the story.

21                  The copy editor comes in at the very end and  
22                  fixes grammar, spelling, sense, inconsistencies, things  
23                  like that.

24                  Q       And is it typical for all publishers to have  
25                  both a copy editor and a content editor?

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Deebs

Stacy Abrams

1 BY MR. PASSIN:

2 Q Oh. I typed it wrong.

3 A I do not --

4 Q Yes or no?

5 A -- recall.

6 Q Excuse me?

7 A I do not recall if I gave her any feedback.

8 Q Did you give her suggestions on how to make it  
9 better?

10 MR. HALPERIN: Objection to form.

11 THE WITNESS: I do not recall.

12 BY MR. PASSIN:

13 Q Now, you pointed out earlier that you were  
14 the -- I'm sorry. What kind of editor was it called?  
15 Copy editor?

16 A Yes.

17 Q Copy editor.

18 So explain to me what kind of changes you made  
19 to the Crave -- each of the books in the Crave book  
20 series.

21 A Generally speaking, I would be looking for  
22 typos, grammatical errors, punctuation errors, spelling  
23 errors, continuity errors. That's it.

24 Q So you did not make changes to the storylines?

25 A No. That was not my role.

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Stacy Abrams

1 Q And did you -- were you the comment editor on  
2 all the books, the Crave books series?

3 MR. HALPERIN: Objection to form. She said the  
4 copy editor.

5 BY MR. PASSIN:

6 Q Copy editor. I'm sorry.

7 A Yes.

8 Q And other than you and Liz Pelletier, who else  
9 was involved in editing the books in the Crave book  
10 series?

11 A Each book would have had two proofreaders.

12 Q All right. But wasn't Emily Kim also involved  
13 in editing the books?

14 A I cannot speak to that, as I was not involved  
15 in that process.

16 Q You just said you were involved in editing. So  
17 I don't understand how you were not involved in that  
18 process.

19 A I'm not involved in the content editing. I  
20 believe that's what you are asking.

21 Q All right. So you -- you believe that Emily  
22 Kim was involved in the content editing?

23 MR. HALPERIN: That is not what she said.  
24 Objection. That misstates --

25 MR. PASSIN: I didn't say she said that,



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1 Counsel.

2 BY MR. PASSIN:

3 Q Do you believe that Emily Kim was involved in  
4 the content editing?

5 A And I said I was not involved in that process.  
6 So I cannot speak to her level of involvement.

7 Q But did she have some involvement --

8 MR. HALPERIN: Objection. Asked and answered.

9 THE REPORTER: And may the reporter hear the  
10 tail end of the question after did she have some  
11 involvement.

12 BY MR. PASSIN:

13 Q -- in the content editing?

14 A As I said, I cannot speak to that.

15 THE REPORTER: And if I could just ask everyone  
16 to give a little pause.

17 BY MR. PASSIN:

18 Q Did you use any material from Masqued in any of  
19 the Crave books?

20 A No.

21 Q Did anyone include any material from Masqued in  
22 any of the books in the Crave series?

23 A No.

24 Q How many computers did you use to edit the  
25 books?

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Stacy Abrams

1                   Excuse me?

2           A       I don't even know what a technological log is.

3           Q       Well, it wasn't a technological log. That's --

4       because he interrupted. It was an access log.

5           A       I do not know what that is either.

6           Q       Did you use any bots to do any of the editing?

7                   MR. HALPERIN: Objection to form.

8                   THE WITNESS: What is a bot?

9       BY MR. PASSIN:

10          Q       That's -- that's probably sufficient an answer.

11       Okay.

12                   Well, did you use any computer software

13       programs that automatically made changes?

14                   MR. HALPERIN: Objection to form.

15                   THE WITNESS: No.

16       BY MR. PASSIN:

17          Q       Did you ever give a copy of Masqued to anyone?

18          A       No.

19          Q       Did you ever give a copy of Masqued to Tracy

20       Wolff?

21                   MR. HALPERIN: Objection. Asked and answered.

22                   THE WITNESS: Again, no.

23       BY MR. PASSIN:

24          Q       Did you ever give a copy of Masqued to Liz

25       Pelletier?

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1 MR. HALPERIN: Objection. Asked and answered.  
2 That's twice for the same question.

3 THE WITNESS: Again, no.

4 BY MR. PASSIN:

5 Q Did you ever -- did you ever discuss Masqued  
6 with anyone?

7 A Are we talking before February of 2022 or not?

8 MR. HALPERIN: Excuse me. Let me --

9 MR. PASSIN: Yes. Before February 22, 2022.

10 MR. HALPERIN: And objection. Asked and  
11 answered.

12 THE WITNESS: No.

13 BY MR. PASSIN:

14 Q Did you ever discuss Masqued with Tracy Wolff?

15 MR. HALPERIN: Objection. Asked and answered.

16 MR. PASSIN: I've got a few more questions.

17 I'm going to get through them. Okay?

18 MR. HALPERIN: That's fine. I'm just lodging  
19 my objections, Mark. I understand.

20 THE WITNESS: Please repeat.

21 BY MR. PASSIN:

22 Q Did you ever discuss Masqued with Tracy Wolff?

23 A No.

24 Q Did you ever discuss Masqued with Liz  
25 Pelletier?

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Freeman vs.  
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Stacy Abrams

1 MR. HALPERIN: Objection. Asked and answered.  
2 THE WITNESS: Again, no.  
3 BY MR. PASSIN:  
4 Q Have you ever discussed Masqued with Emily Kim?  
5 MR. HALPERIN: Objection. Asked and answered.  
6 BY MR. PASSIN:  
7 Q Other than what you testified to today?  
8 A Beyond the initial acquisition, no.  
9 Q Did you ever discuss Lynne Freeman with anyone?  
10 MR. HALPERIN: Objection. Asked and answered  
11 and to form.  
12 THE WITNESS: Before February of 2022?  
13 BY MR. PASSIN:  
14 Q Correct.  
15 A No.  
16 Q Did you ever discuss Lynne Freeman with Tracy  
17 Wolff prior to February 22, 2022?  
18 A No.  
19 Q Did you ever discuss Lynne Freeman with Liz  
20 Pelletier?  
21 MR. HALPERIN: Objection to form -- to asked  
22 and answered.  
23 THE WITNESS: Again, before February of 2022?  
24 BY MR. PASSIN:  
25 Q Yes.

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Stacy Abrams

1           A       No.

2           Q       All right. So let me ask you this: Have we  
3 already discussed today every conversation you had about  
4 Lynne Freeman whether it be either before or after  
5 February 2, 2022?

6                   MR. HALPERIN: Object to form.

7                   THE WITNESS: That's a very broad question. I  
8 think I will need more clarification.

9 BY MR. PASSIN:

10          Q       Well, you've testified earlier about a  
11 conversation you had about -- and I don't -- about -- I  
12 don't even remember if it was about Lynne Freeman or if  
13 it was about Masqued -- with someone after February 2,  
14 2022.

15                   Do you remember that?

16          A       Yes.

17          Q       What was that about? I don't remember.

18                   MR. HALPERIN: Objection.

19                   MR. PASSIN: Is this about Freeman or about  
20 Masqued?

21                   MR. HALPERIN: You can answer whether it was  
22 about Lynne Freeman or about Masqued. But you cannot  
23 divulge -- I'm instructing you not to divulge defense  
24 strategy items that were discussed on that call.

25                   THE WITNESS: I suppose both.

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Stacy Abrams

1 BY MR. PASSIN:

2 Q All right. So my question is: Other than what  
3 you already testified today at your deposition, did you  
4 have any discussions with anyone else after February 2,  
5 2022 about Lynne Freeman?

6 A No.

7 Q All right. And same question but about  
8 Masqued. Have you had any discussions with anyone about  
9 Masqued after February 2, 2022, other than what you  
10 testified about today?

11 A No.

12 Q Okay. Did you ever discuss Lynne Freeman with  
13 Emily Kim -- we talked about that. Okay.

14 Who in connection with the Crave series was the  
15 expert on Alaska?

16 MR. HALPERIN: Objection to form.

17 THE WITNESS: Different expert.

18 BY MR. PASSIN:

19 Q Well, the person supplied most of the factual  
20 information about Alaska.

21 A Google.

22 Q Google.

23 Okay. And who did the research on Google?

24 A I don't know. I was not involved in the  
25 content editing.

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1           Q       Now, Emily Kim has notes on Alaska.

2                   Were those used in connection with the books in  
3 the Crave book series?

4           MR. HALPERIN:  Objection to form.

5           THE WITNESS:  I don't know.  I wasn't involved  
6 in that part of the process.

7 BY MR. PASSIN:

8           Q       All right.  Are you able to describe for me the  
9 contributions that Liz Pelletier made to each of the  
10 books in the Crave book series?

11           MR. HALPERIN:  Objection.  Asked and answered.  
12 She said she was not involved in that part of the  
13 process.

14 BY MR. PASSIN:

15           Q       I was not involved in that part of the process.  
16 So I really can't say.

17                   Are you able to describe for me the  
18 contribution that Tracy Wolff made to each of the books  
19 in the Crave book series?

20           MR. HALPERIN:  Same objection.

21           THE WITNESS:  Same answer.  I was not involved  
22 in the process of content editing.

23 BY MR. PASSIN:

24           Q       Typically, what is a book agent's role in his  
25 or her client's writing of a book?

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1 MR. HALPERIN: Objection to form.

2 THE WITNESS: Well, you say "typically," but  
3 each agent is different. Some get very, very involved.  
4 And others stay uninvolved.

5 BY MR. PASSIN:

6 Q When you say "Some get very, very involved,"  
7 involved in what?

8 A In editing. Content editing. Story creation.

9 Q Did Emily Kim have a greater role in writing  
10 books in the Crave book series than a typical agent  
11 would normally have in his or her client's writing of a  
12 book?

13 MR. HALPERIN: Objection to form. Asked and  
14 answered.

15 THE WITNESS: I can't say. I was not involved  
16 in the content editing.

17 BY MR. PASSIN:

18 Q Do most agents typically write chapter titles  
19 for their clients' books?

20 MR. HALPERIN: Objection to form.

21 THE WITNESS: I don't know what most agents do.

22 BY MR. PASSIN:

23 Q Did Emily Kim create a series Bible for the  
24 Crave book series?

25 A She first created the document, yes.



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Stacy Abrams

1                   What's the truth? Do you make edits on Google  
2 docs, or do you not make edits on Google Docs?

3                   MR. HALPERIN: Objection to form.

4                   THE WITNESS: You're misunderstanding me.  
5 Google Docs is being used for the series Bible only. If  
6 I make edits to the series Bible in my role as the copy  
7 editor.

8                   If there's a brand-new character being  
9 introduced, if there's a new location, it's up to me to  
10 make sure that we're consistent from book to book.

11 BY MR. PASSIN:

12           Q       I see.

13           A       So -- do I --

14           MR. HALPERIN: Mark, excuse me. Let the  
15 witness finish.

16           THE WITNESS: So do I edit the series Bible?  
17 Yes. That's my role as the copy editor.

18           Do I do editing on the book in Google Docs?  
19 No. As I've already stated, I used Microsoft Word.

20 BY MR. PASSIN:

21           Q       All right. And you're sure when you make edits  
22 on this series Bible in Google Docs, it doesn't --  
23 they -- it doesn't send you an email relating to those  
24 changes?

25           MR. HALPERIN: Objection to form.

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1 THE REPORTER: And I'm sorry, it seems like  
2 there may have been something that cut out in the  
3 question. May I have the question again, please.

4 BY MR. PASSIN:

5 Q And when you -- excuse me.

6 And when you make edits on the series Bible on  
7 Google Docs, are you sure that it doesn't send you an  
8 email relating to those changes?

9 A Yes.

10 Q Okay. Did Emily Kim direct you to make any  
11 specific editing changes to any of the books in the  
12 Crave book series?

13 A I don't understand the question.

14 Can you be more specific?

15 Q Did Emily Kim ever tell you to make any  
16 specific editing changes to any of the books in the  
17 Crave book series?

18 MR. HALPERIN: Objection to form.

19 THE WITNESS: No.

20 BY MR. PASSIN:

21 Q Were specific drafts of any of the books in the  
22 Crave book series made specifically for Emily Kim?

23 MR. HALPERIN: Objection to form.

24 THE WITNESS: I was not involved in that  
25 process. So I cannot say.

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1 BY MR. PASSIN:

2 Q Was a synopsis written for each book in the  
3 Crave series prior to it being written?

4 MR. HALPERIN: Objection to form.

5 THE WITNESS: Again, possibly. But I was not  
6 involved in that process.

7 BY MR. PASSIN:

8 Q Do you typically work with book agents when  
9 editing an author's book?

10 MR. HALPERIN: Objection to form.

11 THE WITNESS: Again, no agent is typical. It  
12 depends on the agent and how involved they want to be.

13 BY MR. PASSIN:

14 Q Well, did you work at all with Emily Kim in  
15 editing the books -- the books in the Crave book series?

16 MR. HALPERIN: Objection. Asked and answered.

17 THE WITNESS: I was not involved in that part  
18 of the process. So I really can't say.

19 BY MR. PASSIN:

20 Q Well, now I'm asking about your content  
21 editing --

22 MR. HALPERIN: Objection. It  
23 mischaracterizes --

24 BY MR. PASSIN:

25 Q -- copy editing.

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1 MR. HALPERIN: And I would just instruct the  
2 witness to read the whole chain if she needs to.

3 THE WITNESS: Yes, if you could just give me a  
4 minute.

5 Okay.

6 BY MR. PASSIN:

7 Q Okay. Now, it says there -- this is a text  
8 message. That's from you. Correct?

9 A Yes.

10 Q [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Now, is that the Bible, or is that the  
16 manuscript that you went on?

17 A So it's neither. So, as I mentioned, there  
18 were two different things that I used Google Docs for,  
19 neither of which is related to content editing.

20 The first was the series Bible, which just to  
21 confirm for anyone who might not know what that is, a  
22 series Bible is all the descriptions of characters' hair  
23 color, eye color, spellings of names, locations, any  
24 detail that you would need in Book 5 that might have not  
25 popped up since Book 1. So it is not text that is ever

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1 published. It is just a guide for knowing how to keep  
2 consistency in your series.

3 The other is chapter titles. So this is a  
4 file -- sorry if I'm speaking too quickly. I'll slow  
5 down.

6 The second is the chapter title, Google Doc.  
7 This was a file that we used at the very end after the  
8 books were written to write the chapter titles. There  
9 are many, many chapters in these books, over 100. So we  
10 had to be sure that the titling followed from what the  
11 book -- or what each chapter was about.

12 So my job, as I was copy editing, was to leave  
13 a very short description of each chapter so that Tracy  
14 could go in and write the chapter title based on the  
15 description of what happened in that chapter.

16 This was something that Emily was willing to  
17 help out with and provide ideas. But the final titles  
18 were generally written by Tracy.

19 **Q I don't recall you mentioning the chapter**  
20 **titles before. Maybe -- maybe -- excuse me. Maybe I'm**  
21 **wrong.**

22 MR. PASSIN: Then can you please pull up  
23 0074315.

24 And I have to find it somewhere.

25 VIDEOGRAPHER: Standby, Counsel.

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Stacy Abrams

1           A       It appears to be.

2           Q       When you say "it appears to be," is it or is it  
3 not?

4           A       I believe it is.

5           Q       Okay. All right. I don't have any further  
6 questions.

7                   MR. HALPERIN: I would like to do a very brief  
8 redirect. I'm ready to start if it's okay with Madam  
9 Court Reporter and the witness.

10                  THE WITNESS: Yes.

11                  THE REPORTER: Yes. Thank you.

12                               EXAMINATION

13 BY MR. HALPERIN:

14           Q       Ms. Abrams, you've testified a bit today about  
15 your involvement or lack thereof in the creation and/or  
16 drafting of the Crave series.

17                   Would you just please clarify once and for all  
18 what specifically your role was on those issues?

19                  MR. PASSIN: Objection. Mischaracterizes her  
20 testimony.

21                  THE WITNESS: Yes. So, as I have stated, I was  
22 the original sort of conduit between Tracy and Liz. I  
23 first suggested her to come over to the series and  
24 helped provide feedback back and forth between her and  
25 Liz for the creation of the series.

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1           After that, I was uninvolved until the copy  
2     editing stage where I was in charge of grammar, sense,  
3     punctuation, and collating the entire thing, including  
4     chapter titles into a master file.

5     BY MR. HALPERIN:

6           Q     Earlier in the deposition, I believe you  
7     answered a series of questions with the phrase "it's  
8     possible."

9           Do you recall those questions?

10          A     Yes.

11          Q     Could you please clarify what you mean when you  
12     say the phrase "it's possible."

13               MR. PASSIN: Objection. Vague and ambiguous.

14               THE WITNESS: By that, I mean questions were  
15     relating to things that happened anywhere from ten to 15  
16     to longer years ago. And so when it is very hard to say  
17     for certain, I felt it's possible was a truthful answer  
18     to whether or not something may have occurred, but that  
19     in no way means that it did occur.

20     BY MR. HALPERIN:

21          Q     Does the phrase "it's possible," to you, mean  
22     it's probable?

23          A     No.

24          Q     And one particular -- particularly important  
25     issue I would like to ask you to clarify is earlier in

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Stacy Abrams

1 I, the undersigned, a Certified Shorthand Reporter of  
2 the State of California, do hereby certify:

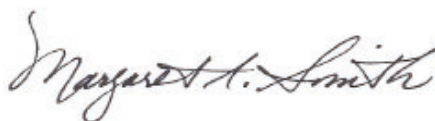
3 That the foregoing proceedings were taken before me  
4 at the time and place herein set forth; that any  
5 witnesses in the foregoing proceedings, prior to  
6 testifying, were duly sworn; that a record of the  
7 proceedings was made by me using machine shorthand,  
8 which was thereafter transcribed under my direction;  
9 that the foregoing transcript is a true record of the  
10 testimony given.

11 Further, that if the foregoing pertains to the  
12 original transcript of a deposition in a federal case,  
13 before completion of the proceedings, review of the  
14 transcript ( X ) was ( ) was not requested.

15 I further certify I am neither financially  
16 interested in the action nor a relative or employee of  
17 any attorney or party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed  
19 by name.

20 Dated: 03/17/2023

21 

22 \_\_\_\_\_  
23 Margaret A. Smith

24 RPR, CRR, CSR No. 9733  
25



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Stacy Abrams

1 DECLARATION UNDER PENALTY OF PERJURY

2 Case Name: Freeman vs. Deebs

3 Date of Deposition: 03/03/2023

4 Job No.: 10115785

5

6 I, STACY ABRAMS, hereby certify  
 7 under penalty of perjury under the laws of the State of  
 8 Virginia that the foregoing is true and correct.

9 Executed this 25 day of  
 10 April, 2023, at Glenview, Illinois.

11

12

13

Stacy Abrams  
Stacy Abrams (Apr 25, 2023 09:31 CDT)

14

STACY ABRAMS

15

Completed via Remote Online Notarization using 2way Audio/Video technology

16 NOTARIZATION (If Required)

17 State of Virginia18 County of Chesterfield

19 Subscribed and sworn to (or affirmed) before me on  
 20 this 25th day of April, 2023,

21 by Stacy Abrams, proved to me on the

22 basis of satisfactory evidence to be the person

23 who appeared before me.

24 Signature:

25

Lauren N Fridley  
 Notary Public -Lauren N Fridley  
 Commission 7699515  
 Expires June 30, 2024  
 Notary Public of Chesterfield County, Virginia

(Seal)

